EXHIBIT D

REVISED PER MEET-AND-CONFER

ATTACHMENT A

I
DEFINITIONS

A. "Monsanto" means the Monsanto Company, as identified in paragraph 12 of the Superseding Indictment.

B. "You" and "your" means Monsanto, and all persons or entities acting on its behalf or under its direction or control, including, without limitation, subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

C. "DBN" means Beijing Dabeinong Technology Group Company and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary DBN North America, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

D. "BKN" means Beijing Kings Nower Seed Science & Technology Co. Ltd. and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary Kings Nower North America Company, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

E. "Superseding Indictment" means the Superseding Indictment filed on July 2, 2014, against Mo Hailong (also known as Robert Mo), Mo Yun, and others, in the federal case *United States v. Li, et al.*, Case No. 13-cr-147, in the United States District Court for the Southern District of Iowa.

F. "Mo Hailong Criminal Complaint" means the Criminal Complaint filed on December 10, 2013 against Mo Hailong (also known as Robert Mo) in the federal case *United States v. Mo Hailong*, Case No. 13-mj-267, in the United States District Court for the Southern District of Iowa.

G. "Mo Yun Criminal Complaint" means the Criminal Complaint filed on July 1, 2014 against Mo Yun in the federal case *United States v. Mo Yun*, Case No. 14-mj-160, in the United States District Court for the Southern District of Iowa.

H. "Defendants" means the defendants charged in the Superseding Indictment, including Li Shaoming, Mo Hailong, Wang Lei, Wang Hongwei, Ye Jian, Lin Yong, and Mo Yun.

I. "Mo Matter" means the pre- and post-indictment investigation of certain allegations of trade secret theft (including corn germplasm and other corn-breeding-related information) by law enforcement authorities detailed in the Superseding Indictment, Mo Hailong Criminal Complaint and Mo Yun Criminal Complaint.

REVISED PER MEET-AND-CONFER

J. "Government" means any and all agents or representatives of federal, state or local government departments, agencies or offices, including but not limited to the United States Department of Justice (including the Offices of the United States Attorney), the Federal Bureau of Investigation, the United States National Security Agency, the United States Central Intelligence Agency, the Department of Homeland Security (including Customs and Border Protection), the United States Department of Agriculture, and the Polk County (Iowa) Sheriff's Department.

K. "Field Corn" means every variety of maize in the United States that is not grown primarily for consumption as human food in the form of fresh kernels or not grown primarily as popcorn; *i.e.,* all varieties of maize besides sweet corn or popcorn.

L. "Documents" means materials producible under the Federal Rules, including materials that are written, printed, recorded, or produced and/or maintained electronically.

M. "Person" is defined as any natural person or any business or organization, including any legal, governmental, for profit and not-for-profit entity or association.

N. The term "concerning" means regarding, relating to, referring to, describing, depicting, evidencing or constituting.

II
INSTRUCTIONS

A. Produce all responsive documents in your possession, custody or control, and as they are kept in the ordinary course of business.

B. If you are unable to produce in full any responsive document, (i) produce each such document to the fullest extent possible; (ii) specify the reasons for your inability to produce the remainder; and (iii) state in detail all of your information and belief about the location and substance of the document.

C. If any responsive document was at one time, but is no longer, in your possession, custody or control, (i) identify each such document; (ii) specify why the document is no longer in your possession, custody or control; and (iii) state in detail all of your information and belief about the location and substance of the document.

D. If any responsive document (or a portion thereof) is withheld on the basis of privilege, identify the following for each such document: (i) date; (ii) author; (iii) addressees; (iv) other recipients; (v) relationship of the author, addressees and recipients to each other, if not readily apparent; (vi) document type (e.g., letter or memorandum); (vii) general subject matter; and (viii) nature of the claimed privilege.

E. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

F. The use of the singular form of any word includes the plural and vice versa.

REVISED PER MEET-AND-CONFER

III
ITEMS REQUESTED

1. All documents responsive to the Subpoena to Produce Documents issued by Mo Hailong in connection with the Mo Matter and served on you on or about January 30, 2015, as revised per meet-and-confer on February 24, 2015.

2. Documents sufficient to identify (i) Plant Variety Protection Act applications and (ii) patent application numbers applicable to each of the following varieties of Monsanto field corn with the following Product ID numbers:

   a.

   b.

REVISED PER MEET-AND-CONFER

c. Monsanto Product ID numbers:

3. Your "breeding book" or, alternatively, any compilation of information, data or records sufficient to identify which Monsanto patent or PVPA application corresponds to which of the Monsanto field corn product identified in Requests 2(a), 2(b), and 2(c).

4. Your "breeding book" or, alternatively, any compilation of information, data or records sufficient to identify which Monsanto patent or PVPA application corresponds to which of the Monsanto field corn product identified in Request 15 of the Subpoena to Produce Documents issued by Mo Hailong in connection with the Mo Matter and served on you on or about January 30, 2015, as revised per meet-and-confer on February 24, 2015.